

VIA HAND DELIVERY

Clerk of the Bankruptcy Court
United States Bankruptcy Court
701 East Broad Street - Room 4000
Richmond, Virginia 23219

McGuire Woods LLP
One James Center
901 E. Cary Street
Richmond VA 23219
Attention: Dion W. Hayes
Attention: Douglas M. Foley

FILED
2009 SEP 14 AM 10:21
RICHMOND DIVISION

VIA FEDERAL EXPRESS

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Attention: Ian Fredericks

Skadden, Aarps, Slate, Meagher
& Flom, LLP
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Chicago, Illinois 60606
Attention: Chris Wilkerson

a.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

-----X
In re: : Chapter 11
: :
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
et. al., : :
: :
Debtors. : Jointly Administered
-----X

**RESPONSE TO NOTICE OF DEBTORS' THIRTY-SIXTH OMNIBUS
OBJECTION TO CLAIMS (DISALLOWANCE OF CERTAIN CLAIMS
RELATING TO SHORT TERM INCENTIVE PLAN)**

b. Claimant: Christopher Newton Crowe. Claim number: 3601. Amount of claim:
\$40,000.

c. The Bankruptcy Court should overturn the objection as to Claimant because Claimant, contrary to filing by counsel to Debtor, did meet the requirements of payment pursuant to the Short Term Incentive Plan (the "STIP"). As the Objection notes, half of the STIP was based upon the company's performance and half was based upon the performance of the individual employee. And as the Objection also notes, the employee was required to be

employed by the company as of the payout date in May. I concede the company portion (50% of my \$40,000 claim) was not earned as the company failed to meet its goals and objectives. I, however, did meet and/or exceed expectations as attested to by my immediate supervisor John Harlow, the company's former COO. Though the company was no longer holding annual evaluations by February 2009, John Harlow wrote a letter of recommendation, dated February 17, 2009, for me that clearly demonstrates that I exceeded my responsibilities to direct and guide the company's evolving real estate strategies. The letter of recommendation is attached hereto as Exhibit A. In fact, mid-way through the STIP's review period (March 1, 2008 through February 28, 2009), I was asked by the company to expand my role as a Director of Real Estate to run the entire Real Estate, Construction, Property Management and STS departments upon the departure of my former supervisor, John Mulleady, VP of Real Estate and Construction. Additionally, I was with the company as of the payout date. My last day with the company was May 29, 2009. For these reasons, I am entitled to 50% of my \$40,000 STIP.

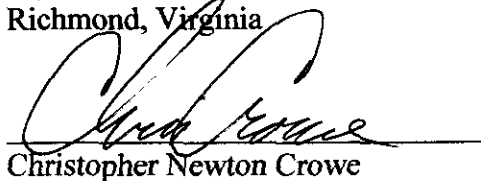
d. At the hearing on September 22, I am prepared to enter an affidavit of John Harlow in support of my claim of meeting and/or exceeding expectations. I am also prepared to present evidence of the last day of my employment of May 29, 2009, should Debtor dispute that claim.

e. With personal knowledge of the relevant facts, I support the declarations made herein.

f. Claimant's address, telephone number and facsimile number:

Christopher N. Crowe
2117 Hanover Ave.
Richmond, VA 23220
Phone: 804-301-7133
Facsimile: N/A
Email: cncrowe@gmail.com

Dated: September 13, 2009
Richmond, Virginia



Christopher Newton Crowe

Exhibit A

To: Whom it may concern
Re: Recommendation letter for Christopher Crowe
Date: February 17, 2009

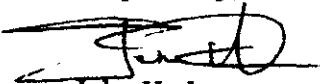
Over the past 14 months, I have had the distinct pleasure to partner with Chris Crowe, in his role as Director of Real Estate for Circuit City Stores, Inc., Chris is an exceptional professional who has demonstrated superb leadership, a perfect balance of tenacity and flexibility, and technical skills that have delivered top notch results, (during the most difficult of times for the company and the marketplace).

Chris took responsibility for the Real Estate/Construction functions at a time when the strategy of the prior leadership had proven unsuccessful. He was able to rapidly focus the team (and the company) on the essential priorities and economics that were aligned with the organizations financial and competitive status.

Chris is a focused professional who leads in a manner that drives results, fosters teamwork/mentoring, and establishes plans for growth and continuous improvement. The breadth of his knowledge: location analysis, financial acumen, legal experience gives him great credibility at all levels within and outside the organization.

In my role as Executive Vice President and Chief Operating Officer, I worked with Chris on a daily basis on matters ranging from strategic plans, site selection/store opening, to restructuring the business to provide financial runway. Chris is not only one of the most talented executives/leaders within our 43,000 associate enterprise, but is easily the strongest real estate executive that I have worked with in my 28 years in this industry. I heartily recommend Chris Crowe to any organization and would welcome any additional reference questions on his behalf.

Respectfully,



John Harlow
Executive Vice President/Chief Operating Officer
Circuit City Stores, Inc.